

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

RYAN PFLIPSEN,	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION
vs.	)	
	)	FILE No. 5:21-cv-225-DAE
NEW ECKHERT SQUARE, LTD,	)	
d/b/a ECKHERT SQUARE,	)	
	)	
Defendant.	)	

**JOINT STIPULATION TO DISMISS COMPLAINT WITH PREJUDICE**

COME NOW the Parties, by and through the undersigned counsel, and hereby file this Joint Stipulation to Dismiss Complaint with Prejudice and without costs, pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii).

Respectfully submitted this 7<sup>th</sup> day of February, 2022.

Respectfully submitted,

**KURZ LAW GROUP, LLC**  
4355 Cobb Parkway, Suite J-285  
Atlanta, GA 30339  
[www.kurzlawgroup.com](http://www.kurzlawgroup.com)  
(404) 805-2494 Telephone  
(770) 428-5356 Facsimile

By: s/Dennis R. Kurz  
Dennis R. Kurz  
Texas State Bar No. 24068183  
[dennis@kurzlawgroup.com](mailto:dennis@kurzlawgroup.com)

**ATTORNEYS FOR PLAINTIFF**

**LANGLEY & BANACK, INC.**  
Trinity Plaza II, 7<sup>th</sup> Floor  
745 East Mulberry

San Antonio, Texas 78212  
(210) 736-6600 – Telephone  
(210) 735-6889 – Facsimile

BY: /s/ William W. Sommers  
WILLIAM W. SOMMERS  
State Bar No. 18842600  
[wsommers@langleybanack.com](mailto:wsommers@langleybanack.com)  
ERICA E. VALLADARES  
State Bar No. 24045841  
[evalladares@langleybanack.com](mailto:evalladares@langleybanack.com)  
NATALIE F. WILSON  
State Bar No. 24076779  
[nwilson@langleybanack.com](mailto:nwilson@langleybanack.com)  
**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of February, 2022, a true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system.

Erica E. Valladares, Esq.

**LANGLEY & BANACK, INC.**

745 Mulberry Avenue, Suite 700

San Antonio, Texas 78212

[evalladares@lingleybanack.com](mailto:evalladares@lingleybanack.com)

Attorney for Defendant

/s/ Dennis R. Kurz

Dennis R. Kurz